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April 14, 2025

Via ECF & EMAIL

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
EngelmayerNYSDChambers@nysd.uscourts.gov

Re: *Ti Goodwin v. Oren Alexander*, 25-CV-2247 (PAE)
Joint Request to Stay Proceedings.

Your Honor:

We write jointly on behalf of all parties pursuant to the Court's Order dated March 19, 2025, which directed the parties to submit a Civil Case Management Plan and Scheduling Order, as well as a joint letter in advance of the initial pretrial conference currently scheduled for April 16, 2025, at 2:00 p.m.

By way of background, this matter involves a cause of action under the Victims of Gender-Motivated Violence Protection Law ("VGMVPL"), N.Y.C. Admin. Code § 10-1101 *et seq.* Plaintiff alleges that she was surreptitiously drugged and subsequently raped after meeting Defendant Oren Alexander ("Defendant") at a Gotham Magazine party on February 13, 2011.

Defendant denies these allegations and contends that the action is time-barred and preempted by New York State's Child Victims Act ("CVA") and Adult Survivors Act ("ASA"). Defendant also anticipates filing a motion pursuant to Federal Rule of Civil Procedure 12(b) seeking dismissal of the Complaint with prejudice.

In light of the evolving legal landscape relevant to the claims at issue in this matter, the parties respectfully request that the Court stay the proceedings for a period of six (6) months. Specifically, we ask that the Court adopt the same approach it recently employed in *Willet v. Alexander*, No. 24-CV-05672 (NRB) and *Laura Byck v. Tal Alexander, et al.*, No. 25-CV-2112 (NRB), and stay this action pending developments in related appellate proceedings.

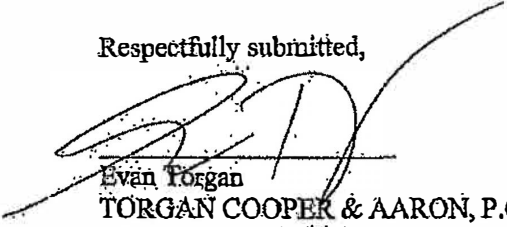
| TORGAN, COOPER + AARON, P.C. |

As Your Honor may be aware, two cases currently pending before the United States Court of Appeals for the Second Circuit—*Parker v. Alexander*, No. 24 Civ. 4813 (LAK), 2025 WL 268436 (S.D.N.Y. Jan. 22, 2025), and *Doe v. Black*, No. 23 Civ. 6418 (JGLC), 2024 WL 4335453 (S.D.N.Y. Sept. 27, 2024)—raise substantially similar legal questions to those presented by Defendants in this matter. The Second Circuit's resolution of those appeals is likely to be dispositive or, at minimum, instructive with respect to the central issues in this case.

Accordingly, in the interest of judicial economy and to avoid potentially unnecessary motion practice, the parties respectfully request that the Court enter an informal stay of all deadlines and proceedings in this matter for a period of at least six months, or until further direction is received from the Court following resolution or clarification from the Second Circuit.

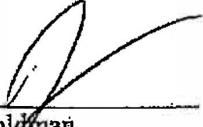
We thank the Court for its attention to this matter and are available to provide any additional information the Court may find helpful.

Respectfully submitted,



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GRANTED. This case is hereby stayed pending the Second Circuit decisions in *Parker v. Alexander*, No. 24 Civ. 4813 (LAK), 2025 WL 268436 (S.D.N.Y. Jan 22, 2025), and *Doe v. Black*, No. 23 Civ. 6418 (JGLC), 2024 WL 4335453 (S.D.N.Y. Sept. 27, 2024). The parties are to jointly file a status update no later than two weeks after the date of each decision.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

April 14, 2025
New York, New York